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PROPOSED ATTORNEYS FOR DEBTORS

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re: § Chapter 11
ERG Intermediate Holdings, LLC, *et al.*,¹ § Jointly Administered
Debtors. § Case No.: 15-31858-hdh-11

NOTICE OF AGENDA OF MATTERS
SCHEDULED FOR HEARING ON JUNE 1, 2015 AT 1:30 PM CENTRAL TIME

MATTERS BEING CONTINUED

1. Debtors' Motion for Entry of an Order (I) Authorizing the Retention and Employment of AP Services, LLC and (II) Designating Rebecca A. Roof as Chief Restructuring Officer *Nunc Pro Tunc* to April 30, 2015 [Docket No. 79].

Status: Pursuant to ongoing negotiations with the Official Committee of Unsecured Creditors, the Debtors will seek to continue the hearing on this motion until the scheduled hearing date on June 9, 2015.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

MATTERS GOING FORWARD:

2. Motion of the Debtors for an Order (I) Establishing Bar Dates for Filing Proofs of Claim and (II) Approving Form and Manner of Notice Thereof [Docket No. 77].

Status: No objections have been filed. The Official Committee of Unsecured Creditors has informally requested certain minor comments be added to the order pertaining to this motion. The Debtors have agreed to incorporate these comments. This matter is going forward.

Dated: May 28, 2015
Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley

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